Shared CROMERR Services IPT Questionnaire Summary

October 18, 2012

These materials are in draft form as of 10/18/2012. Additional updates to this material will be provided and posted to EPA's website prior to the EN Grant deadline.

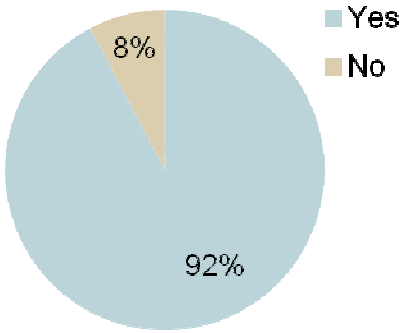
Shared CROMERR IPT Questionnaire Summary

- Questionnaire sent out to IPT participants on 09/27
- Two week period for responses provided
- 13 out of 17 participants responded – 76% return
- Team has consolidated and summarized responses received to date
- Today: Review overall feedback and set discussion priorities moving forward

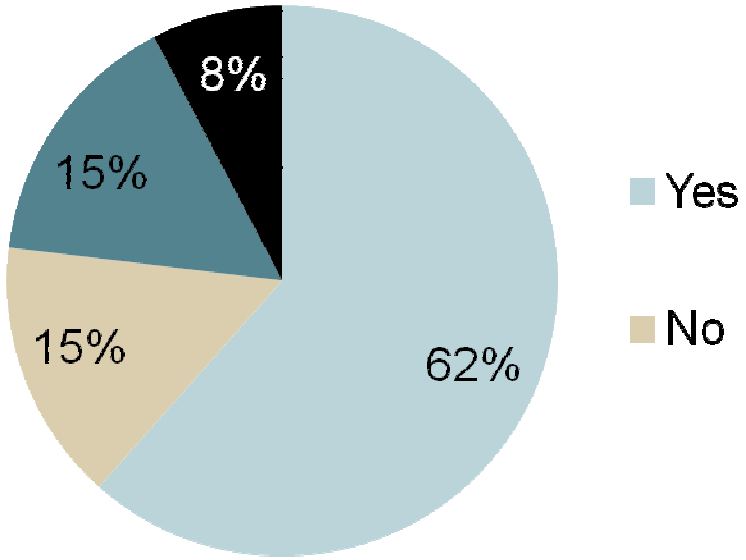
Current Reporting Capabilities

Do you accept data electronically?

Response	Count
Yes	12
No	1



Do you have a current approach to meet CROMERR reqts?



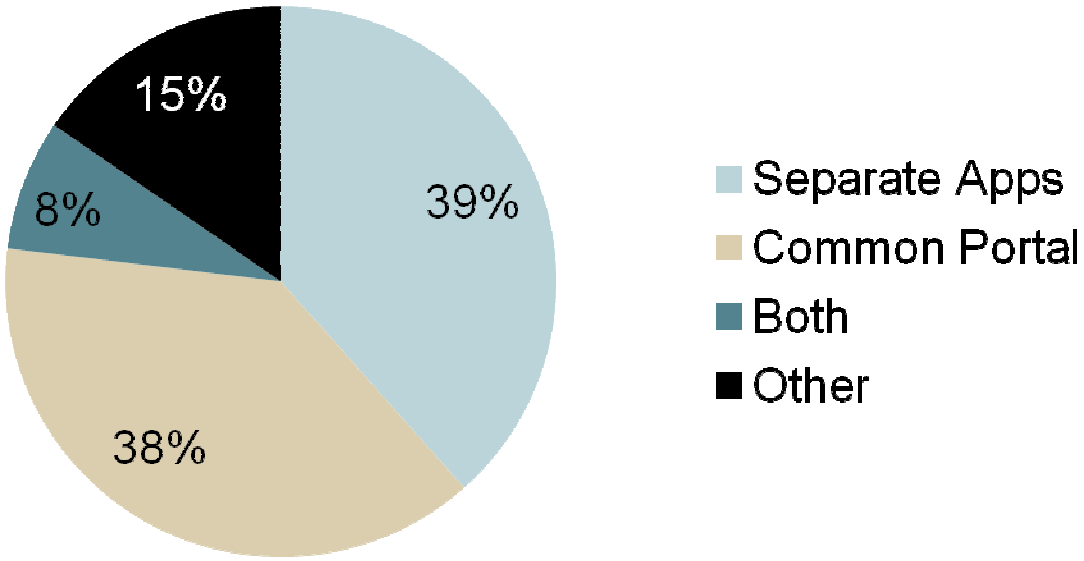
Response	Count
Yes	8
No	2
Partial	2
Not Applicable	1

Environmental Information eXchange Network

Current Reporting Capabilities

Do you have one common portal or separate apps to meet electronic reporting requirements?

Response	Count
Separate Applications	5
Common Portal	5
Both	1
Other (use EPA systems)	2



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Themes from 3-5 Critical Benefits

Compliance Assistance

- Implied CROMERR compliance
- CROMERR audits easier
- Faster EPA approval
- Consistent records retention

Cost/Resource Savings

- Less staff time commitment
- Faster application development
- Cost savings using shared services
- Support when CROMERR rules change
- Shared expertise
- Common support model

User Friendly Experience

- Consistent reporting
- Multi-State user consistency
- Simplified registration process

Technical

- Web services for integration
- E-Signature service

Themes from 3-5 Challenges

Technical

- Application integration
- Different technologies
- Data stores not application ready
- eSignature/Security infrastructure
- Auditing features
- ID proofing/ Authentication
- COR Storage/retrieval
- Synchronizing user data
- State technology stds

Business

- Business process changes needed
- Burden on regulated community
- Users completing ESA requirements
- Non-tech savvy users
- User adoption and training
- Long approval process

Resources

- IT Costs
- Funding
- Limited staff resources
- Budget Cuts
- Limited in-house expertise

Themes from Policies and Driving Forces

Legal/Policy

- ECOS/EPA E-Enterprise Working Group
- EPA eReporting Rule
- CROMERR vs E-Sign Act
- Open Records
- eDiscovery
- Confidentiality/Privacy
- Policies against storing data in the cloud

Business

- Financial constraints
- Delineate who owns the data
- Confidentiality of records
- Support for auditing in MOU
- Existing investment for eReporting

Technical

- Security of web services interfaces
- Managing user/registration data
- States control of data life cycle
- Direct access to state-tribe local databases?

General Features and Requirements

Four key functional areas for CROMERR

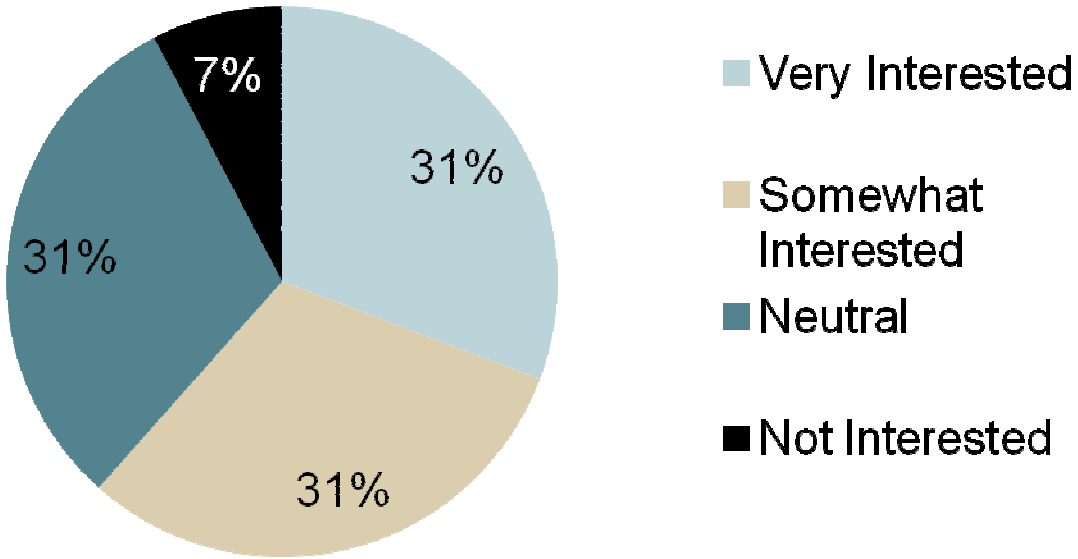
1) Registration
2) Signature and Submission Process
3) Signature Validation
4) Copy of Record

Shared CROMERR Services
IPT Service Selection Response Summary (Section IV, Q6)

Shared CROMERR Service Category	Yes	No
Shared Registration Services	10	3
Identity Proofing Services	12	1
ESA processing/Paper recording	7	6
Human Readable COR Display/Certification Statement	9	4
Signature Ceremony Components	11	2
Create/Apply Signature and Create COR	10	3
Notification Services	10	3
Centralized COR Services	9	4
User Account Administration Services	9	4

Interest in Shared Registration Services

Response	Count
Very Interested	4
Somewhat Interested	4
Neutral	4
Not Interested	1



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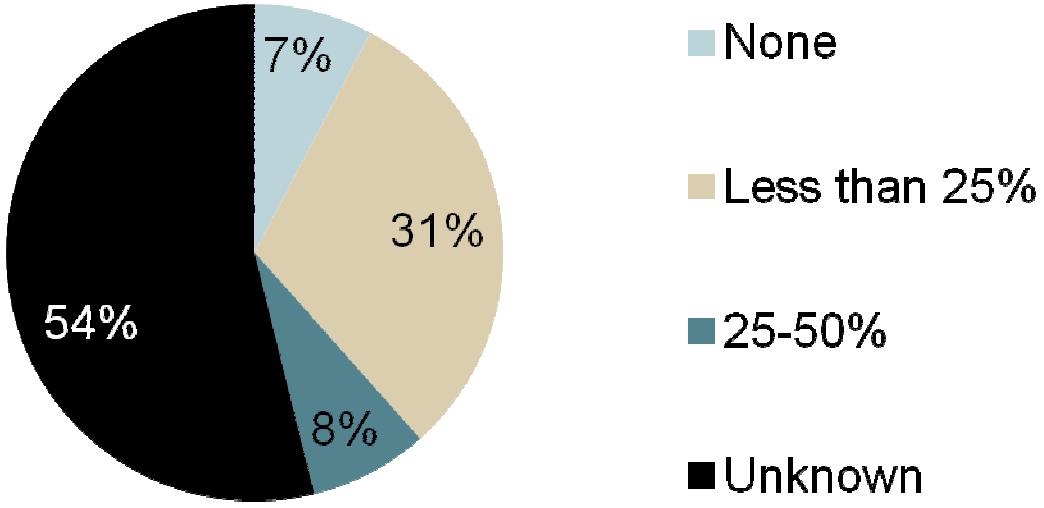
Frequency of sharing registration information between organizations

Response	Count
None	1
Less than 25% of registrants	4
25-50% of registrants	1
50-75% of registrants	0
Greater than 75% of registrants	0
Unknown	7



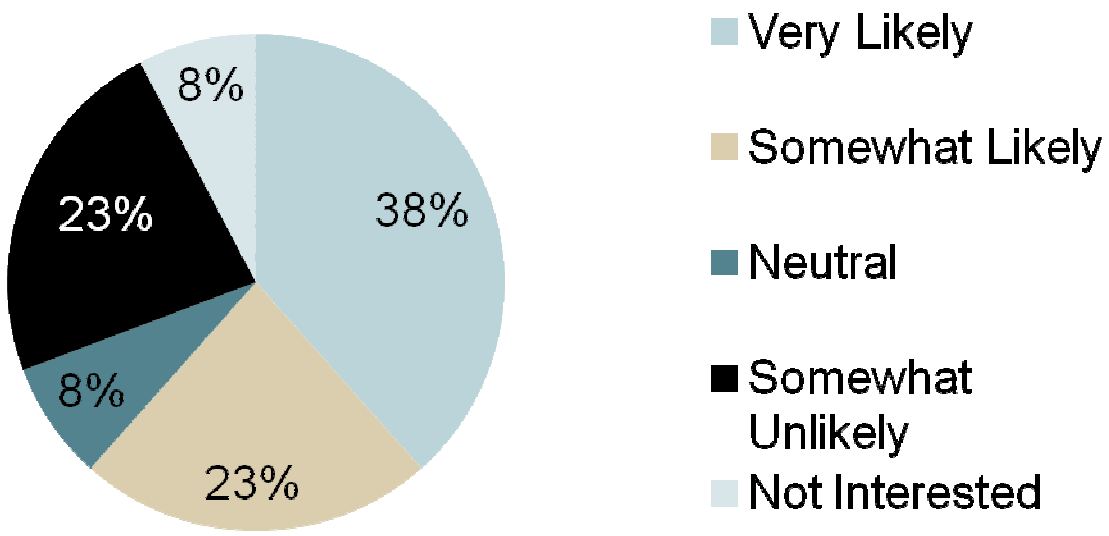
What capabilities are needed for providing ID proofing for ESA?

- Team members differ related to central/local ESA processing
- Automation
  - Eliminate wet-ink where possible
  - Incorporate electronic ID proofing
  - Method to identify users who have been ID proofed using ESAs elsewhere
- Authorization
  - How to address this requirement?
- Records storage, retention and support for ESA retrieval when needed

Signature and Submission

Would you use a shared service for submitters to view a human readable copy prior to signature?

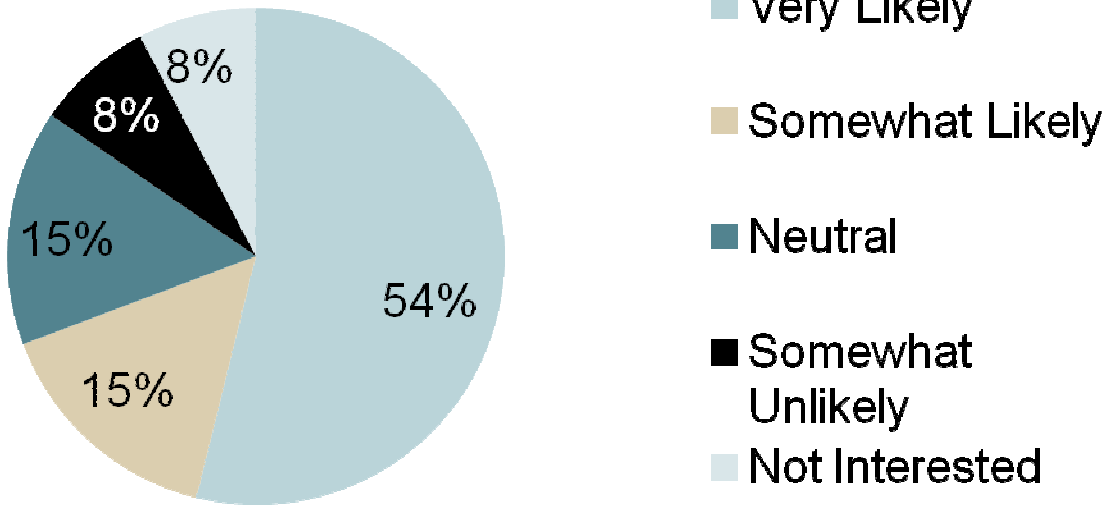
Response	Count
Very Likely	5
Somewhat Likely	3
Neutral	1
Somewhat Unlikely	3
Not Interested	1



Signature and Submission

Would you use a shared service for the signature ceremony?

Response	Count
Very Likely	7
Somewhat Likely	2
Neutral	2
Somewhat Unlikely	1
Not Interested	1



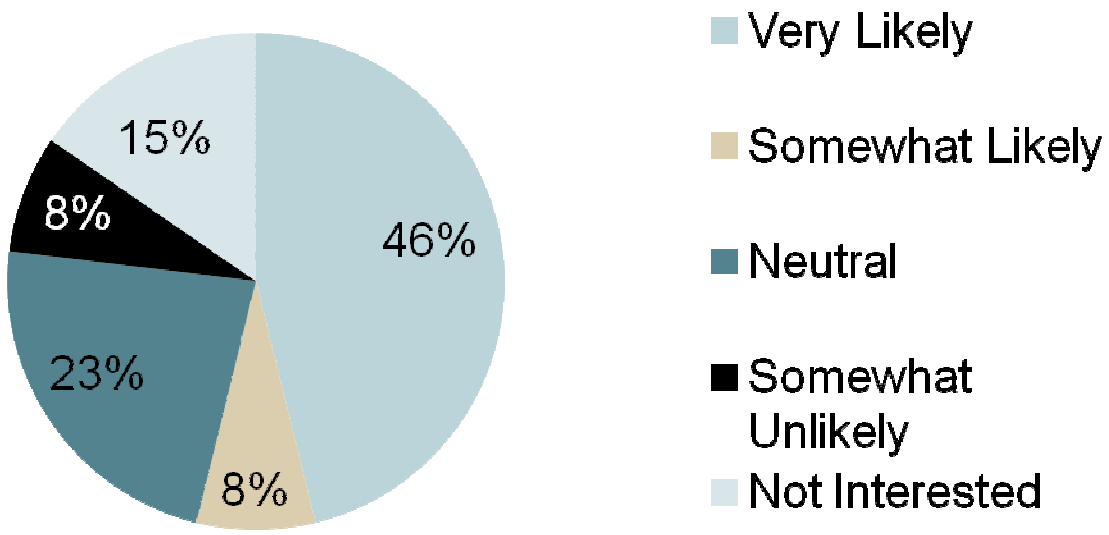
How would out of band notifications be achieved in a Shared services model?

- Combination of local system as email address provider and shared service to generate/send
- Desire for granular control/understanding of events that trigger emails
- Email notifications should be automated and not manual
- Internal notification to trading partners should be supported
- Support for re-generation of email communication
- Need support for secondary confirmation emails
- Examine compliance with E-Sign Act

Signature Validation

Allow services to interact with the registration system for authentication, lock/disable users and usage notifications?

Response	Count
Very Likely	6
Somewhat Likely	1
Neutral	3
Somewhat Unlikely	1
Not Interested	2



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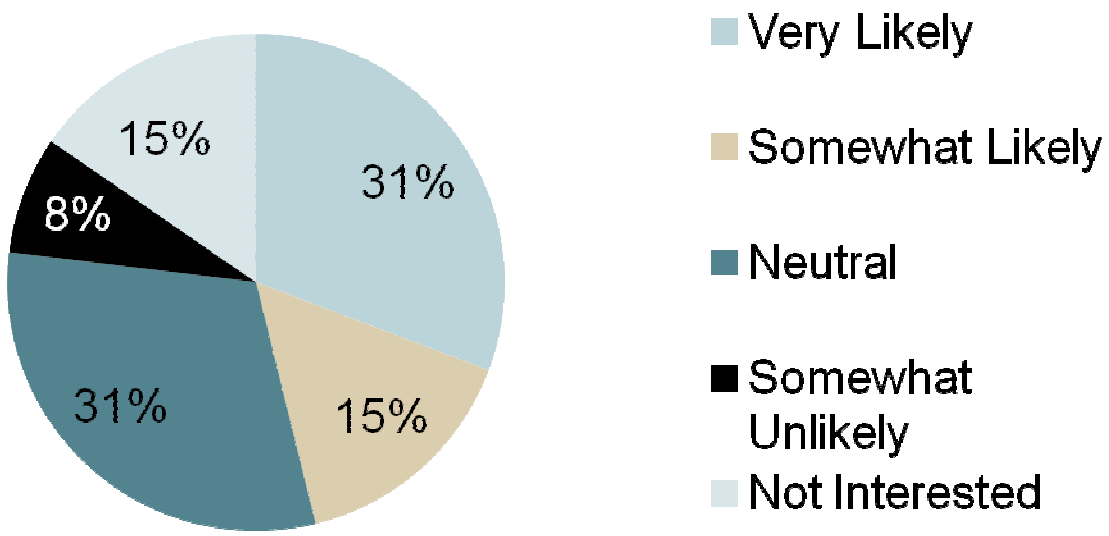
Copy of Record

How likely would you consider COR to be stored centrally and distributed as needed?

Response	Count
Very Likely	4
Somewhat Likely	2
Neutral	4
Somewhat Unlikely	1
Not Interested	2



Shared service/central location for COR

Narrative Feedback themes

- Multiple options are of interest to IPT (local or central storage)
- Storage Considerations
  - Records retention requirements
  - Version management
- Technical Considerations
  - Security for document access
  - Reliability and availability of services
  - Large submissions with multiple addendums and attachments
- Policy and business considerations
  - Compliance with State law
  - Will need to examine accessibility/maintenance of data for local staff
  - Clear MOU on who owns the data

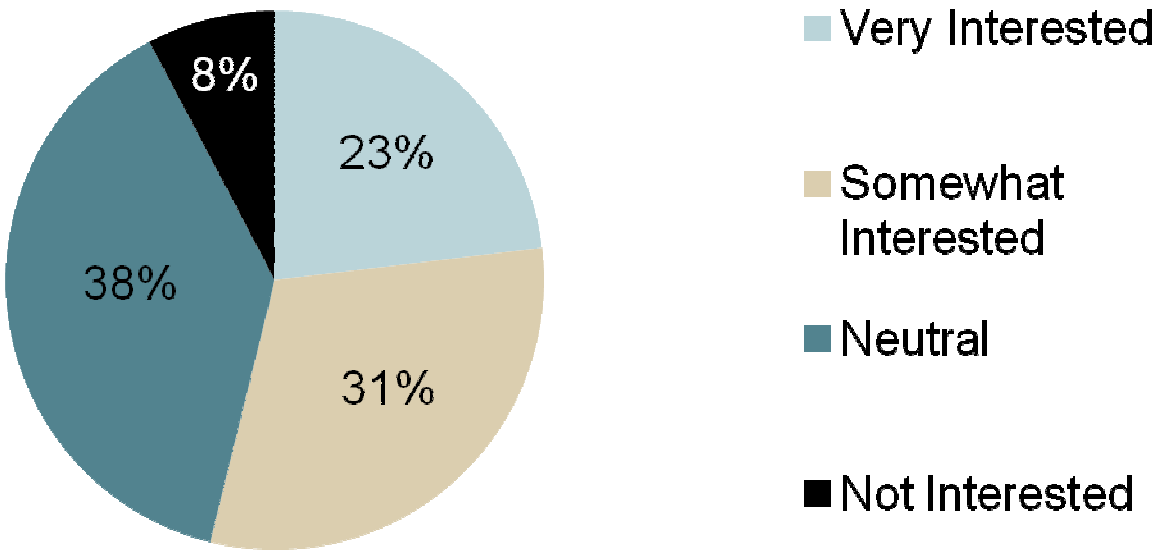
Vision for shared CROMERR services

Narrative Summary Themes

- Web Service based approach as predominant theme
  - Some interest in portal-like or code components
- Integration of applicable web services into State applications
  - Services should be “invisible” to the user
  - Black box services (non-UI) invoked from State apps
- Services can be used separately
- User Identity Integration questions/themes
  - Service to synchronize user updates between the EPA and states
  - Shared user registrations will be very useful
  - Need clarification on how user identities and profiles will be integrated

Proof of Concept Interest

Response	Count
Very Interested	3
Somewhat Interested	4
Neutral	5
Not Interested	1



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Next Steps

- Additional Q&A from summary presentation
- Governance model feedback (pending)
- Review of possible service options
- Prioritization of call topics
- Schedule moving forward

Governance Model Feedback

Shared CROMERR Services

Governance, Roles/Responsibilities and Ops.
Governance Model Observations

- Leverage existing Exchange Network governance models
- State – Tribal – US EPA Partnership model allowing for
  - US EPA owned and maintained services
  - Joint decision making between States and EPA
  - MOU to detail specifics for use, operation, data, etc.
- Ongoing involvement of implementers to contribute to decision making on feature-sets that are part of services
- Governance concepts that are viewed as purview of adopter:
  - Adoption and use of services within state application
  - Transactional systems are responsibility of the trading partner
  - Business rules for users, etc. that are the relevant to the specific data collection

Governance, Roles/Responsibilities and Ops.
MOU Considerations

- Operational details
  - Roles and responsibilities
  - Service Level Agreements (uptime, availability, performance)
  - Backups and disaster recovery provisions
  - References to security auditing
  - Help Desk expectations
  - Notifications for scheduled maintenance
  - Backwards compatibility for serve upgrades
- Policy and other related details
  - Confidentiality of records and record disposition
  - Ownership of data
  - Long term funding
- Use of Open Source coding (nothing proprietary)

Governance, Roles/Responsibilities and Ops.
Models for incident/problem management

- Consider leveraging CDX Node Help Desk model
- Provide Help Desk and Ticketing system
- Searchable Database for adopters (tips, issues, FAQ)
- Defined and documented bug tracking and escalation process
- Adopt industry standards for shared vocabulary (e.g. ITIL)
- Will need to differentiate Centralized Help Desk vs. Trading Partner level support with routing for reported tickets

Governance, Roles/Responsibilities and Ops.
Models for change control and release management

- Establish defined process and best practice for Dev, Test, and Prod environments and how implementers adopt/use each
- Backwards compatibility and support for previous service versions for defined periods of time
- Fixed schedule of maintenance patches
- Appropriate timelines for trading partner testing and integration
- Version checking capabilities for implementers
- Appropriate and detailed documentation is critical to success

Governance, Roles/Responsibilities and Ops.
Expectations for dev support, documentation, training

- Detailed and up to date documentation is critical
- Documentation examples referenced
  - User Manual
  - Developer technical guide materials
  - Quick Start guide
- Training examples referenced
  - Webinars
  - Recorded training sessions
  - Developer forum or contact mechanism
  - Train the trainer (technical and community facing)
- Avoid proprietary code dependencies